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June 10, 2021

VIA ECF

The Honorable Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East, 1214 South
Brooklyn, New York 11201

Re: Hewitt v. Pratt Institute, No. 1:20-cv-02007-ERK-SJB: Joint Motion to Extend Case Schedule

Dear Judge Bulsara,

Pursuant to II.A of the Court's Individual Practice Rules, Plaintiffs Juna Hewitt and Kristen Thomas, on behalf of themselves and all others similarly situated, and Defendant Pratt Institute, by and through their respective counsel, respectfully submit this joint letter-motion seeking to modify the case schedule adopted by the Court's (Bulsara, J.) October 19, 2020 Minute Entry and Order, in light of, *inter alia*, Pratt Institute's pending Motion to Dismiss (Dkt. 22) and other developments described below.

The parties jointly submit as follows:

1. On May 1, 2020, plaintiffs Juna Hewitt and Kristen Thomas filed a complaint against Defendant Pratt Institute for breach of contract, unjust enrichment, conversion, and money had and received. (Dkt. 1).
2. On September 29, 2020, plaintiffs filed an Amended Complaint. (Dkt. 16).
3. On October 19, 2020, the Court (Bulsara, J.) entered a Minute Entry and Order setting a case schedule that includes (i) a fact discovery cutoff of June 23, 2021; (ii) a deadline for

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the completion of all discovery by September 15, 2021; and (iii) a last date of October 15, 2021 to take the first step in a dispositive motion practice.

4. On December 14, 2020, plaintiffs served their First Set of Interrogatories and Requests for Production of Documents. Defendant served responses and objections on January 13 and 27, 2021.
5. On January 14, 2021, defendant filed a motion to dismiss for failure to state a claim. (Dkt. 22).
6. On May 6, 2021, the case was reassigned from Chief Judge Margo K. Brodie to Judge Edward R. Korman for all further proceedings.
7. The parties agree that additional time is required for discovery given defendant's pending motion to dismiss.
8. The parties therefore jointly request that the Court extend the fact discovery deadline in the Initial Scheduling Order dated October 19, 2020 by six months and amend the additional deadlines as shown in the proposed revised schedule below:

Event	Current Deadline	Proposed Deadline
All fact discovery completed	June 23, 2021	December 23, 2021
Plaintiffs to file motion for class certification	October 15, 2021	April 25, 2022
Plaintiffs' expert reports due by	July 28, 2021	April 25, 2022
Defendant to file opposition to motion for class certification	n/a	June 24, 2022
Defendant's expert reports due by	July 28, 2021	June 24, 2022
Expert depositions to be completed by	August 27, 2021	July 29, 2022
Plaintiffs to file reply in support of motion for class certification	n/a	August 19, 2022
Post-certification discovery on the identity of putative class members and class-wide damages by	n/a	60 days from the date of the Court's order on Plaintiffs' motion for class certification

Event	Current Deadline	Proposed Deadline
Dispositive motions to be served by	October 15, 2021	No later than 30 days from the completion of discovery
Proposed joint pre-trial order filed	TBA	TBA
Final pre-trial conference	TBA	TBA

DATED: June 10, 2021

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